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February 2, 2007

TO: Each Supervisor

FROM: Bruce A. Chernof, M.D.
Director and Chief Medical Officer

SUBJECT: **"NO DRUGS DOWN THE DRAIN" PROGRAM**

This is in response to the October 31, 2006 Board Motion instructing the Director of Health Services, in collaboration with the Directors of Public Health and Public Works, County Counsel, and Chief Administrative Officer to work with the Los Angeles County Sanitation Districts to pursue an integrated County-wide unused or expired drug collection and disposal program with a broad educational component. The Motion seeks to expand the "No Drugs Down the Drain" program, and provide County residents with additional drop-off sites, including but not limited to our own County clinics and pharmacies, expanding the County-wide Household Hazardous Waste (HHW) Management Program, and encouraging participation by commercial pharmacy chains, such as Rite-Aid and CVS Pharmacies.

Pursuant to the Board's motion, the Departments of Health Services, Public Health, Public Works, County Counsel, and Chief Administrative Officer established a work team to review current County processes, and identify opportunities to expand current drug disposal programs. It was found that a drug disposal program currently exists. The Los Angeles County Department of Public Works, in partnership with the County Sanitation Districts, operates the County-wide Household Hazardous Waste (HHW) Management Program. The HHW Management Program consists of an educational effort and a collection component. Included in the ongoing educational component are newspaper advertisements, community fliers (posted in community libraries, schools, groups, and stores) and an active website (www.888cleanla.com). The collection component includes one permanent collection site (in Palmdale) and an average 55 mobile HHW collection events per year, held in different locations throughout the County. The Department of Public Works will be issuing a Request for Proposal to enhance its outreach for the HHW Management Program, which will also address the management of unused pharmaceutical waste. Additionally, the City of Los Angeles operates six permanent S.A.F.E. (Solvents/Automotive/Flammables/Electronics) Centers which also accept pharmaceuticals. These S.A.F.E. Centers are open to all Los Angeles County residents.

The "No Drugs Down the Drain" program was initiated in March 2006 by the Los Angeles County Sanitation Districts, City of Los Angeles and Orange County Sanitation District. It is a public outreach program intended to alert Southern California residents to the issues associated with flushing unused, unwanted and expired medication through the sewage system. Bilingual

information cards were distributed to over 1900 community pharmacies during the March 2006 campaign, and a detailed website (www.nodrugsdownthedrain.org) was created to provide the public with alternative, environmentally-appropriate disposal options. This website also provides information regarding HHW collection events, and tips on how to safely dispose of medications in household trash containers. The Sanitation Districts indicate that they intend to partner with the same public agencies again this year to repeat the "No Drugs Down the Drain" program. The 2007 program will once again distribute the bilingual information cards to community pharmacies located in each agency's respective service area, and will advertise in local newspapers, community letters and periodicals.

Licensed healthcare facilities are held to higher regulatory standards regarding disposal of pharmaceutical waste through two regulatory standards involved in regulating the disposal of pharmaceutical waste, the U.S. Drug Enforcement Agency regulations for controlled substances, and the California Medical Waste Management Act for non-controlled substances. In addition, hazardous pharmaceutical disposal (chemotherapy and specific outpatient medications such as nicotine, nitroglycerin and warfarin) must be disposed of following regulations set by the Environmental Protection Agency's Resource Conservation and Recovery Act (RCRA). In fact, pharmaceuticals include a wide range of substances, including oral solids, liquids, injectable, flammable, and even hazardous materials. Given the stricter regulatory disposal standards for healthcare facilities, combined with safety exposure concerns for existing clinic/pharmacy patients and County personnel, the use of DHS/DPH clinics and pharmacies is not recommended as a disposal site for unwanted pharmaceuticals.

In our initial discussions regarding an integrated County-wide unused or expired drug collection program, the County work team recommends enhancing the existing Department of Public Works and Los Angeles County Sanitation District websites to incorporate expanded information and educational materials relating to the appropriate disposal of unused pharmaceuticals. In addition, a link to the HHW collection website and the "No Drugs Down the Drain" website, featuring detailed information on the appropriate method of disposal of unused pharmaceuticals, will be provided to visitors to the Departments of Health Services and Public Health websites. Finally, the two commercial pharmacy chains contacted declined participation at this time in providing drop-off sites within their stores due to their concerns regarding health and liability.

The County work team also recommends pursuing the expansion of the existing HHW Management Program to increase educational outreach and the number of HHW permanent centers and mobile collection events. Also under consideration are expanded educational efforts involving circulation of promotional material throughout the various DPH clinics and DHS pharmacies, as well as the use of the media to increase outreach. Other organizations that have been proposed as potential partners in community outreach/education include local environmental/watershed groups, senior organizations, the medical community and associated professional organizations. Also recommended is the pursuit of potential partnerships with receptive commercial or law enforcement entities, which may provide additional drop-off sites throughout the County. Since this issue is of concern to all residents within California, efforts will be made to evaluate other programs within the State, particularly in counties with similar demographics, and determine if any of their programs may be adapted to Los Angeles County.

DHS, in collaboration with the established County work team, will continue to work with the Los Angeles County Sanitation Districts, and provide your Board, no later than August 1, 2007, with an updated status of our efforts to enhance our existing unused or expired drug collection and disposal program. At that time, DHS and the other County departments will provide further

details regarding any recommended pilot programs, increased collection sites and advertising campaigns, and any associated costs and funding sources.

BAC: ag
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c: Chief Administrative Officer
County Counsel
Executive Officer, Board of Supervisors
Director, Department of Public Health
Director, Department of Public Works
Director, Los Angeles County Sanitation Districts